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Comments on Draft Intertie Cost Allocation Report

1 message

Dana Jacobson <DJacobson@valleywater.org>

Thu, Jan 23, 2014 at 10:54 AM

To: "bbryant@usbr.gov" <bbryant@usbr.gov>, "mdenning@usbr.gov" <mdenning@usbr.gov>

Cc: Cindy Kao <CKao@valleywater.org>

Dear Ms. Bryant,

Thank you for the opportunity to comment on the December 2013 Draft Delta-Mendota Canal/California Aqueduct Intertie Cost Allocation Information Report (Report). The allocation of construction costs proposed in the Report places the entire burden of cost on south of Delta agricultural contractors. While this would minimize costs to the Santa Clara Valley Water District (Santa Clara), we do not believe it is an appropriate approach for the reasons described below.

The purpose of the Intertie, as stated in Reclamation's 2009 Record of Decision for the Intertie Environmental Impact Statement and reiterated in the 2013 Intertie Cost Allocation Information Report, is "to improve the DMC conveyance conditions that restrict the Jones PP to less than its original design pumping capacity of 4,600 cfs and to improve operational flexibility for operations, maintenance, and emergency activities." These improvements will assure continued delivery of CVP water for beneficial purposes and provide benefits beyond modeled increments of long term water supply; indeed, the intertie improves the reliability of deliveries to not only agricultural water contractors, but to all south-of Delta users that receive water pumped from Jones pumping plant.

The determination in the Report that the Intertie should be a new facility with a separate conveyance pumping allocation is contrary to past Reclamation cost allocation and repayment principles. The initial authorization for this project was as an operations and maintenance project with the stated purpose of improving conveyance conditions resulting from subsidence issues on the Delta-Mendota Canal. Therefore, an appropriate allocation of costs would be to utilize the conveyance cost pool for recovery.

Again, we appreciate the opportunity to comment and encourage Reclamation to adopt the use of the conveyance cost pool for recovery of Intertie costs. Please contact Mr. Dana Jacobson by telephone at (408) 630-2932 or by email djacobson@valleywater.org with any questions.

Sincerely,

Dana Jacobson

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